

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ERNEST JOHN GILL

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Criminal No.

[UNDER SEAL]

(18 U.S.C. §§ 2252(a)(2) and
2252(a)(4)(B))

18-21

INDICTMENT

COUNT ONE

The grand jury charges:

On or about May 31, 2017 in the Western District of Pennsylvania and elsewhere, the defendant, ERNEST JOHN GILL, did knowingly distribute visual depictions, namely images in digital and computer graphics files to an address known to the grand jury, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict prepubescent minors and minors who have not attained 12 years of age, engaging in sexually explicit conduct, using a means and facility of interstate and foreign commerce, specifically by computer.

In violation of Title 18, United States Code, Section 2252(a)(2).

FILED

JAN 30 2018

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

COUNT TWO

The grand jury further charges:

From on or about June 21, 2017 to on or about June 22, 2017, in the Western District of Pennsylvania and elsewhere, the defendant, ERNEST JOHN GILL, did knowingly distribute visual depictions, namely images in digital and computer graphics files to an address known to the grand jury, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict prepubescent minors and minors who have not attained 12 years of age, engaging in sexually explicit conduct, using a means and facility of interstate and foreign commerce, specifically by computer.

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT THREE

The grand jury further charges:

On or about July 9, 2017, in the Western District of Pennsylvania and elsewhere, the defendant, ERNEST JOHN GILL, did knowingly distribute visual depictions, namely images in digital and computer graphics files to an address known to the grand jury, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict prepubescent minors and minors who have not attained 12 years of age, engaging in sexually explicit conduct, using a means and facility of interstate and foreign commerce, specifically by computer.

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT FOUR

The grand jury further charges:

On or about July 20, 2017, in the Western District of Pennsylvania, the defendant, ERNEST JOHN GILL, did knowingly possess and knowingly access with intent to view visual depictions, namely, videos and images in computer graphics files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict prepubescent minors and minors who have not attained 12 years of age, engaging in sexually explicit conduct, all of which had been shipped and transported in interstate and foreign commerce, including by means of a computer.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One and Two of this Indictment are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeitures pursuant to Title 18, United States Code, Section 2253(a)(3).


2. As a result of the commission of the violations charged in Counts One through Four of this Indictment, the defendant, ERNEST JOHN GILL, did use the following to commit or to promote the commission of said violations (hereinafter collectively referred to as the "Subject Property"):

- a) One (1) Samsung Galaxy S7 Cellular phone M/N: SM-G930P, MEID: 089820800702438035;

WHEREFORE, the government seeks forfeiture of the Subject Property pursuant to Title 18, United States Code, Section 2253(a)(3).

A True Bill.


FOREPERSON


SCOTT W. BRADY
United States Attorney
PA ID No. 88352